

## UNITED STATES DISTRICT COURT

for the

Northern District of Texas

Fort Worth Division

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

\_\_\_\_\_  
Lewis Brooks McKenzie

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

\_\_\_\_\_  
See ATTACHED

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name \_\_\_\_\_ Lewis Brooks McKenzie

Street Address \_\_\_\_\_ 706 W. 4th St.

City and County \_\_\_\_\_ Clarksville, Red River

State and Zip Code \_\_\_\_\_ TX 75426

Telephone Number \_\_\_\_\_ 972.837.5678

E-mail Address \_\_\_\_\_ LBMTCU@GMAIL.COM

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	See all Defendants on ATTACHED document
Job or Title ( <i>if known</i> )	Uploaded into SAME CASE TXND 4:23-cv-00371
Street Address	Should be ECF 29, Pages 7-8 lists all parties.
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

E-mail Address *(if known)* \_\_\_\_\_**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Federal Removal USC 1443 being wholly ignored by Texas Attorney General, State of Texas, and other conspirators. Issuance of illegal warrant, among other actions, while case is currently removed to TXND 4:23-cv-00371-O-BP

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_.

## b. If the plaintiff is a corporation

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, *(name)* \_\_\_\_\_, is a citizen of

the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_, is incorporated under  
the laws of the State of *(name)* \_\_\_\_\_, and has its  
principal place of business in the State of *(name)* \_\_\_\_\_.  
Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_,  
and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the  
same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at  
stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the  
facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant  
was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights,  
including the dates and places of that involvement or conduct. If more than one claim is asserted, number each  
claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if  
needed.

A. Where did the events giving rise to your claim(s) occur?

Tarrant County, Texas, 233<sup>rd</sup> District Court and Texas Attorney General Office

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B. What date and approximate time did the events giving rise to your claim(s) occur?

Beginning in early 2019 and culminating between April 17, 2023 and CURRENT

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

Please see ATTACHED filing into TXND which contains all pertinent information. Both Montion to Quash (ECF 20) and the original Petition for Removal (ECF 1) have been wholly ignored and State actors and individuals continue to ignore. An illegal hearing was scheduled, and an illegal warrant issued, all while removed to TXND from April 17, 2023 to current.

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#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

I have been living under continual judicial oppression, assisted by private and Attorney General attorneys. Currently I am at an undisclosed location as an illegal warrant was issued for my arrest approximately 10 days after I perfected the Federal Removal, which is still ongoing. Due to this constant stress and legal abuse, I have developed numerous physical and mental ailments that were not present prior to this experience. As an educated PhD in Experimental and Developmental Psychology, I am very, very well acquainted with the devastating effects of severe and prolonged stress, and that such stress (caused by the State and other actors) absolutely contributes to numerous physical and psychological diseases that one would not naturally acquire, I also live under constant fear of illegally being approached by law enforcement, which as everyone is aware may result in the death of the individual at any time. So, no, minor compensation is not a fix.

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#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

April 17, 2023 - CURRENT, the listed actors are mainly attorneys and judges, all who are well aware of the illegality of their actions. I am living under an illegal warrant that these actors refuse to lift, even after filing documents stating they violated the law, continuing to CURRENT. Actual damages have been to my psychological wellbeing, depression, physical maladies that are directly cporrelated with extreme stress, and an inability to work or seek employment as I cannot go out in public without fear of arrest or worse. Punitive Damages are being requested in the amount of \$250,000.000 for EACH instance of Federal Violations by all parties who have a Bar Card, as a deterrant for future criminal acts. Any party who has never had a BAR Card should be assessed \$100,000,00 Punitive Damages as every party was fully informed via Service of the Federal Removal and the exact Federal laws they would be breaking, so no person can claim ignorance.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/16/2023

Signature of Plaintiff /s/ Lewis Brooks McKenzie

Printed Name of Plaintiff Lewis Brooks McKenzie

### B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

Pro Se 2 (Rev. 12/16) Complaint and Request for Injunction

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E-mail Address

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## Defendants for Injunction (Exhibits refer to ECF 29)

### JUDGES:

233rd District Judge Kenneth Newell (Exhibit B.)

Title IV D Associate Judge Cherami Jenkins (Exhibit B.)

### ATTORNEYS:

Jody A. Souddress Tx Bar No. 20286550

Pamela Bridges Tx Bar No. 24001784

Choya Burkley Tx Bar No. 24012361 (Exhibit C.)

Karla Byrd Tx Bar No. 24097445 (Exhibit B.)

Paula Crockett Tx Bar No. 00798123 (Exhibit B.)

Stephen E Hammel Tx Bar No. 24043710 (Exhibit B.)

Tameka Boyd Tx Bar No. 24027406 (Exhibit B.)

### OTHER:

Thomas Wilder, Tarrant County District Clerk (Exhibit C.)

Kelli Marie (Rayburn) McKenzie, Party (Exhibit D.)